

**REMARKS**

The present Amendment amends claim 1, and leaves claims 13-15 unchanged. Therefore, the present application has pending claims 1 and 13-15.

The Examiner is invited to contact Applicants if further clarification is required to bring the claims into allowable form.

**35 U.S.C. §112 Rejections**

Claims 1 and 13-15 stand rejected under 35 U.S.C. §112, second paragraph as allegedly being indefinite for failing to point out and distinctly claim the subject matter that Applicants regard as the invention. Applicants submit that claims 1 and 13-15, as now more clearly recited, are in compliance with the provisions of 35 U.S.C. §112.

To further illustrate features of the present invention, the Examiner's attention is directed to Fig. 9 and the accompanying text at page 31, line 17 to page 35, line 8. As shown, the controller, upon receiving from the client a first lock request (905) for an area of said at least one storage device, issues a second lock request (910) to the at least one storage device to lock an area of the at least one storage device, and after receiving either status information of good or status information of reservation conflict from the at least one storage device, issues a second command of lock OK (930) to the client in order to receive a first command of lock Acknowledge (935) from the client, and upon receiving the first command of lock Acknowledge (935) from the client, sends a second command of lock Acknowledge (940) to the at least one storage device to update the contents of the lock management table of the at least one storage device to indicate lock ON for the area

of the at least one storage device so that deadlock can be avoided when a first lock request is received from another client on the basis of contents of a lock management table of the at least one storage device. The controller, after receiving a first I/O request (945) from the client, issues a first I/O response (950) to the client and issues a second I/O request (955) for sending data received from the client to the at least one storage device until the controller receives a first unlock request (965) from the client. The controller, upon receiving the first unlock request (965) from the client, issues a second unlock request (970) to the at least one storage device to unlock the area of the at least one storage device. The controller, upon reception of a second command of unlock OK (972) from the at least one storage device, sends a second command of unlock Acknowledge (978) to the at least one storage device to unlock the area of the at least one storage device.

These features of the present invention are now more clearly recited in claims 1 and 13-15. Therefore, Applicants respectfully request the Examiner to reconsider and withdraw the rejection.

In view of the foregoing amendments and remarks, Applicants submit that claims 1 and 13-15 are in condition for allowance. Accordingly, early allowance of claims 1 and 13-15 is respectfully requested.

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To the extent necessary, Applicants petition for an extension of time under 37 CFR 1.136. Please charge any shortage in fees due in connection with the filing of this paper, including extension of time fees, or credit any overpayment of fees, to the deposit account of Mattingly, Stanger, Malur & Brundidge, P.C., Deposit Account No. 50-1417 (referencing attorney docket no. 500.44034X00).

Respectfully submitted,

MATTINGLY, STANGER, MALUR & BRUNDIDGE, P.C.

A handwritten signature in cursive script, reading "Donna K. Mason", is written over a horizontal line.

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